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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

ROBERT CHEN,)
)
 Plaintiff,)
)
 vs.) Case No. 2:24-CV-00198-
) ABJ
 DAVID CHEN,)
)
 Defendant.)
)
)

MOTION TO TRANSFER

COMES NOW Defendant, David Chen, by and through his counsel Crowley Fleck, PLLP and presents the following motion to transfer this action pursuant to 28 USC § 1404(a) to the District of Maryland. In support of this motion, Defendant also submits the accompanying Memorandum of Law and the Declaration of Timothy M. Stubson, with exhibits thereto.

Plaintiff filed the above-captioned matter on September 30, 2024. A related action has been pending in the District of Maryland, *Yao v. Chen, Otter Audits LLC, & RC Security LLC*, No. 8:23-cv-00889-TDC (D. Md. 2023), since March 31, 2023, where discovery on the very same issues sought to be litigated in this action is ongoing. Contemporaneously herewith the Defendant has filed his Motion to Stay Answer Deadline. This motion to transfer serves the convenience of

witnesses, judicial economy, and the interests of justice because of the already-pending claims and defenses, as well as ongoing discovery, in the District of Maryland, which substantially overlap with Plaintiff's claims here.

WHEREFORE Defendant prays for a transfer of this action to the District of Maryland.

Dated this 12 day of November, 2024.

CROWLEY FLECK PLLP

/s/ Timothy M. Stubson

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served on the 12 day of November, 2024, via ECF Electronic filing to the following:

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/s/ Timothy M. Stubson
Timothy M. Stubson